

6. Ms. S took GOMEZ's photo and used it, along with the information from Citizens Bank, to obtain fake ID's with the names and addresses of Citizens' customers but with GOMEZ's photo.

7. GOMEZ then used these fake IDs to make the fraudulent withdrawals from Citizens Bank. She gave the cash she withdrew to Ms. S, who paid Gomez approximately \$500 a day for her work.

The Fraudulent Withdrawals

8. Between December 29, 2010 and January 8, 2011, GOMEZ used a fake Rhode Island driver's license to withdraw \$39,500 from Citizen's Bank customer Patricia C.'s savings accounts at Citizens Bank branches in Stoneham, Andover, Reading, Woburn, and Kingston, Massachusetts.

9. GOMEZ also attempted an additional \$6,500 withdrawal from Patricia C.'s account on January 8, 2011, but the teller rejected this attempt because she thought the fake driver's license was suspicious and because Patricia C.'s last name was misspelled on it.

10. From July 19, 2011 to July 20, 2011, GOMEZ, posing as Citizens Bank customer Susan P., withdrew \$7,400 from Susan P.'s Citizens savings account at bank branches in Walpole and Arlington, Massachusetts.

11. From July 18, 2011 to July 21, 2011, GOMEZ, posing as Citizens Bank customer Joanne W., withdrew \$20,200, in five separate transactions, from two different Citizens savings accounts belonging to Joanne W. These withdrawals were made at Citizens Bank branches in Norwood, Belmont, Lexington, and Bedford, Massachusetts.

12. GOMEZ also attempted to make withdrawals from the Citizens Bank accounts belonging to Julie R. (\$2,800 on August 31, 2011) and Sandra H. (\$3,800 on September 3,

2011). But Citizens tellers rejected both withdrawals because the addresses on GOMEZ's fake ID's did not match the information that Citizens had for the accounts.

COUNT ONE
Bank Fraud
(18 U.S.C. § 1344)

13. The Grand Jury realleges and incorporates by reference the allegations in Paragraphs 1-12 and further charges that:

14. In the District of Massachusetts and elsewhere, the defendant,

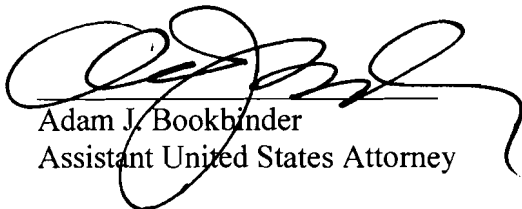
KIMBERLY GOMEZ,

and others, knowingly and willfully executed, and attempted to execute, a scheme to defraud a federally insured financial institution – Citizens Bank – and to obtain money under the custody and control of the financial institution, by means of false and fraudulent pretenses, representations, and promises.

All in violation of 18 U.S.C. §§ 1344, 2.

A TRUE BILL

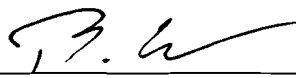

Grand Jury Foreperson


Adam J. Bookbinder
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

March 19, 2014

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk 3/19/14 @ 12:55pm